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### REMARKS/ARGUMENTS

Claims 1-5, 9-13, 16-18, 21, and 24 are pending in this application, and claims 1-5, 9, 11-13, 16-18, and 21 are currently amended. Such amendments are fully supported by the specification. For at least the reasons stated below, Applicant asserts that all claims are in condition for allowance.

### CLAIM INFORMALITIES

Examiner indicates that various claims must be amended or renumbered to synchronize with previous amendments. The foregoing amendments address the issues raised by Examiner and bring the pending claims into accordance with the last entered amendment.

### CLAIM REJECTIONS UNDER 35 U.S.C. § 103

Claims 1-5, 9-13, 16-18, 21, and 24 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over "Kana and WebLine Team to Provide Industry's Most Comprehensive Online Customer Interaction Solution", *Business Wire*, Apr 20, 1999 (hereinafter, *WebLine*) in view of Ray et al. (U.S. Patent No. 6,018,722) (hereinafter *Ray*) and further in view of Schileru-Key (U.S. Patent No. 6,388,688) (hereinafter *Schileru-Key*). The cited references do not teach or suggest all the claim limitations as required by MPEP § 2143. For at least this reason, the rejection is unsupported by the art and Applicants respectfully request that Examiner withdraw the § 103 rejection.

The present invention generally provides for an Internet-based financial modeling and counseling system for assisting users with planning and achieving their financial goals as claimed. Applicants' claimed invention operates within a web-based environment such that users receive both automated financial coaching and live financial coaching. Moreover, the automated financial coaching (1) is based on financial modeling and the user's profile, (2) includes suggestions to change the user's portfolio, including financial products and recommended securities for the user to purchase, and (3) includes suggestions that are presented in a natural language format.

The cited references do not teach or suggest at least these limitations, as required by MPEP § 2143, and therefore Applicants request that the § 103 rejection be withdrawn.

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**(a) AUTOMATED FINANCIAL COACHING BASED ON FINANCIAL MODELING AND USER PROFILE**

The present claimed invention recites "providing to the user automated financial coaching...based on the financial modeling and reflecting the profile [of the user]." Specifically, the automated financial coaching, which supplements the live financial coaching, is provided to the user such that it is derived from the financial modeling that includes the user profile.

*WebLine*, *Ray*, and *Schilleru-Key*, each alone or in combination, fail to teach or suggest such automated coaching that is based on modeling and user profiles. Whereas *WebLine* discloses an open-architecture method for companies to integrate Internet commerce, service, and telephony infrastructures of their customer service centers, *see* page 2, there is no discussion in this reference of modeling or user profiles in the context of automated financial coaching. Similarly, *Ray* discloses a computer-implemented securities portfolio management system that performs research and analysis with respect to its customers' objectives. *See* Col. 1, line 56-Col. 3, line 34. However, whereas *Ray* discloses posing various questions to a customer through an online questionnaire, *see* Col. 4, line 66-Col. 5, line 19, there is no teaching of a financial model that includes a user profile, upon which automated financial coaching is based. Finally, *Schilleru-Key*, which describes a computer system and method of operation to allow navigation and exploration of spatial environments to enhance the observer's "view of the real environment represented by the virtual environment," also fails to teach or suggest modeling or user profiles in the context of automated financial coaching.

**(b) AUTOMATED FINANCIAL COACHING INCLUDES SUGGESTIONS TO CHANGE THE USER'S PORTFOLIO**

The present claimed invention further recites "providing to the user automated financial coaching...wherein the customized financial coaching includes suggestions for changes to a current financial portfolio of the user...wherein the suggestions include financial products and recommended securities for the user to purchase." Specifically, the automated financial coaching, which supplements the live financial coaching, incorporates specific suggestions regarding the user's portfolio, including products and securities.

*WebLine*, *Ray*, and *Schilleru-Key*, each alone or in combination, fail to teach or suggest such suggestions. As described herein, each of the cited references is distinguishable from the

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present claimed invention with respect to the manner in which the claimed invention provides automated financial coaching.

(c) ***AUTOMATED FINANCIAL COACHING INCLUDES SUGGESTIONS THAT ARE PRESENTED IN A NATURAL LANGUAGE FORMAT***

Finally, the present claimed invention recites "providing to the user automated financial coaching...wherein the suggestions are presented in a natural language format..." Specifically, the automated financial coaching, as distinct from the live financial coaching, is presented to the user in a natural language format.

*WebLine*, *Ray*, and *Schileru-Key*, each alone or in combination, fail to teach or suggest such suggestions in a natural language format. As described herein, a distinguishing factor of the present claimed invention with respect to the cited references is the manner in which the claimed invention provides automated financial coaching.

Because the cited references alone or in combination fail to teach or suggest all of the claim limitations of claims 1-5, 9-13, 16-18, 21, and 24, and because there is no suggestion or motivation to combine the references in such a way as to teach or suggest these limitations, Applicants respectfully request that the Examiner's § 103 rejections be withdrawn.

**CONCLUSION**

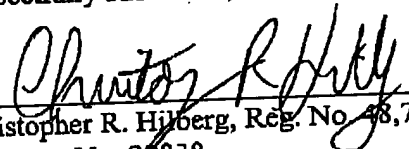
Applicants submit that all pending claims are allowable and respectfully request that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (612) 607-7386.

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If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees including fees for any extension of time, to Deposit Account No. 50-1901 (Reference 60021-375702).

Respectfully submitted,

By

  
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